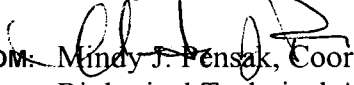


UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION II

DATE: MAR 03 2004

SUBJECT: Biological Technical Assistance Group Review
Biological Monitoring Plan for Kin-Buc Landfill

FROM:  Mindy J. Pensak, Coordinator
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TO: Grisell Diaz-Cotto, Remedial Project Manager
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The following comments represent the Region II Biological Technical Assistance Group (BTAG) review as discussed during the meeting of September 17, 2003. The document reviewed by the group was the Biota Monitoring Study (Year 6), dated March 2003, and prepared by Normandeau Associates, for Operable Unit 2 (OU2) of the Kin-Buc Landfill site located in Edison Township, Middlesex County, New Jersey.

The most obvious omission in the Year 6 Biota Monitoring Study is the lack of an attempt to identify existing or possibly new sources of PCBs at the site. Page 2 of the Executive Summary states that "due to concern regarding the possibility of a continuing source of PCB contamination to the Edmonds Creek Marsh Sediments that data collected from past and future monitoring efforts will not identify, a visual site investigation will be conducted. The results of this investigation (when completed) will be reported separately." The consensus from previous BTAG meetings regarding the ongoing post-remedial biomonitoring at the Kin-Buc Landfill Site was that a program should continue beyond the five-year post-remedial period and that a scaled-down version would be acceptable during the additional contaminant delineation activities. It appears no effort was taken to address the ongoing/new contaminant source issue. Section 6.0, Recommendations for Future Study, does not include any recommendations on activities to identify a continuing source of PCB contamination. This issue must be addressed prior to any additional biomonitoring efforts. Specifically, an attempt should be made to characterize the extent and degree of contamination in Edmonds Creek and Edmonds Creek Marsh and to investigate current PCB source(s) and pathways to the creek and marsh. This will require more intensive sediment sampling of Edmonds Creek than currently proposed in the biomonitoring plan and more than just a "visual site investigation" of any additional sources that may be in the vicinity of the site.

On page 8 (Section 3.1, Materials and Methods, Collection), it is noted that composite sediment samples were collected from throughout Edmonds and Reference Creeks. The continued presence of sediment PCB contaminant levels in excess of the 5 ppm clean-up in composited sediment samples suggests that discrete samples may be present at significantly higher values. It is unclear why composited sediment samples are still being collected from the locations of the discontinued *Macoma* bioaccumulation study. The *Macoma* locations should now be analyzed as discrete sediment samples in an attempt to focus in on areas that may still contain elevated levels of PCBs. While the concept of composited sediment samples for representing exposure for fiddler crabs may still be appropriate, the decision to use composited sediment samples for the fiddler crab locations should be revisited to determine if discrete samples would be more advantageous for these locations in the pursuit of locating the PCB source areas.

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On page 10 (Section 3.2.1, Edmonds Creek Zones), it is noted that total PCB concentrations for 3 of the 28 sediment samples still yielded results exceeding the 5 ppm remedial goal; these elevated concentrations were observed in Unremediated Zone 1 and Remediated Zone 3. Though these data do suggest an improvement over the 1999 sampling data where 8 of the 28 samples were found to exceed 5 ppm, we do not support the recommendation presented on page 26 that "monitoring frequency can be reduced to a two-year schedule." The data trends (for data collected from 1995 to 2002) presented in Figures 7 through 13 show that although some of the zones had total PCB values less than 5 ppm, they are also still showing an upward trend for some samples. It is essential to identify whatever continuing source of PCBs may be present in the area. Identification of the source will most likely require additional and more intensive sampling in Edmonds Creek within the sampling zones already established (e.g., a grid rather than a transect), sampling outside the established zones, and sampling sources outside the creek (e.g., seeps from other landfills in the area).

Page 16, Section 4.0, Fiddler Crab Tissue Analysis. The report notes that tissue burdens in fiddler crab have trended downward. The data trends presented in Figures 16 through 22 suggest otherwise, especially for Zone 3 where the "Pool C" discharge was located.

Page 21, Section 5.0, Mummichog Tissue Analysis. The report notes the mummichog data have fluctuated from year to year and incorrectly notes that there is no directional trend. The data trends presented in Figures 25 through 32 show that levels are steady or slightly increasing in mummichog.

Page 26, Section 6.0, Recommendations for Future Study. The BTAG does not support the conclusion that because sediment concentrations appear to be attenuating, monitoring frequency can be reduced to a two-year schedule. The BTAG also does not support discontinuation of the Reference Creek sampling. Reference sampling needs to be retained to provide a direct comparison that reflects more global inter-annual changes.

The BTAG is interested in reviewing any future documents pertaining to this site. If you have any questions, comments, or require further information, please contact Christopher Stitt at (732) 321-6676.

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